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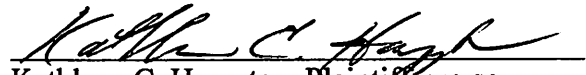
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Trust (“PROF”), as required by paragraph 20 of the Deed of Trust, and second BANA would have made an Assignment to PROF and the same would have been filed in the County Deeds office prior to a foreclosure sale (December 7, 2015) – see Exhibit 56, Assignment of Deed of Trust signed December 17, 2015, and recorded on December 28, 2015, electronically, signed by someone other than BANA as its attorney-in-fact, for which Plaintiff takes issue, and it further does NOT “sell” to PROF and has some bogus description of the property. This is clearly an invalid Assignment and was signed ten days after said foreclosure attempt December 7, 2015, and filed in the courts twenty-one days after said foreclosure sale – also not a wet-ink original since sent electronically, which can be held questionable on that alone. This Court has by Order [19], in response to Plaintiff’s Response [16], which included Exhibit Y (pp. 110-129 of the Loudoun County Circuit Court Amended Complaint), directed Defendants Fay Servicing, LLC (“Fay”) and Samuel I. White, P.C. (“White”) to produce evidence of foreclosure before proceeding further in opposition to Plaintiff’s claim. Also, prior to Bank Defendants appearance in this case, Plaintiff filed a Response [7] to Fay and White’s Motion to Dismiss, which included Exhibit X (the Loudoun County initial Complaint, together with its Exhibits B-D – Exhibit A already having been filed with the District Court’s initial Complaint – and further including Exhibit E – identified above as Exhibit 56 from the Amended Complaint, the Assignment of Deed of Trust from BANA to PROF). This later Exhibit X is mentioned here since Bank Defendants have submitted the same as their Exhibit A (without Plaintiff’s Exhibit E) attached to its Memorandum of Law in Support of its motion. Plaintiff has felt that it is critical to keep both courts advised as to the status of each since they are so intertwined. Plaintiff addresses the remaining claims that are noted by Bank Defendants as insufficiently pled and barred by the applicable statutes of limitation in her Reply Brief filed simultaneously herewith.

Plaintiff further notes here that pursuant to the Roseboro Notice, which accompanied Bank Defendants Motion to Dismiss and Memorandum in Support, and attachments thereto, filed electronically in the court on March 31, 2016, and mailed to Plaintiff April 1, 2016, which Plaintiff received April 4, 2016 at 3:45pm, said service being made under Fed. R. Civ. P. Rule 5(b)(2)(C), three days being added after the period would otherwise expire under Rule 6(a), Plaintiff timely responds herein with her opposition and attaches hereto her further Reply Brief.

Dated: April 25, 2016

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Kathleen C. Hampton', is written over a horizontal line.

Kathleen C. Hampton, Plaintiff *pro se*
34985 Snickersville Turnpike
Round Hill, Virginia 20141
540-554-2042

CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of April, 2016, the foregoing document was filed with the Clerk of the Court by hand delivery and was served by first class mail, postage prepaid on the following:

N. Patrick Lee, Esq.
McGuireWoods LLP
1750 Tysons Boulevard, Suite 1800
McLean, Virginia 22102-4215
*Counsel for Defendants Bank of America, N.A.,
Countrywide Home Loans Servicing, LP, Fannie
Mae, Mortgage Electronic Registration Systems,
and Countrywide Home Loans, Inc.*

Daniel K. Eisenhauer, Esq.
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Lisa Hudson Kim, Esq.
SAMUEL I. WHITE, P.C.
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Virginia Beach, Virginia 23462
*Counsel for Defendants Fay Servicing and
Samuel I. White, P.C.*


Kathleen C. Hampton, Plaintiff *pro se*

STATE OF VIRGINIA
COUNTY OF LOUDOUN

CERTIFICATION

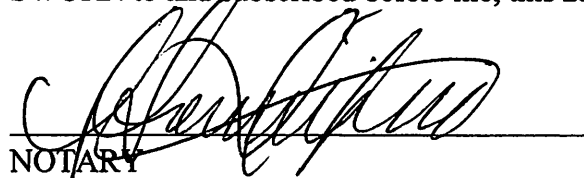
I, Kathleen C. Hampton, hereby certify that I am the plaintiff in this action. I have read the foregoing Response and it is true of my own knowledge, except as to those matters stated on information or belief, and as to those matters, I believe it to be true.

I declare under penalty of perjury under the laws of the Commonwealth of Virginia that the foregoing is true and correct.

Date of execution: April 25, 2016


Kathleen C. Hampton, Plaintiff *pro se*

SWORN to and subscribed before me, this 25th day of April, 2016.


NOTARY

My Commission Expires: 08/31/2017



UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

KATHLEEN C. HAMPTON
Plaintiff,

v.

Civil Action No. 1:15 CV 1624

PROF-2013-53 LEGAL TITLE TRUST, ET AL.
Defendant.

CERTIFICATION

I declare under penalty of perjury that:

No attorney has prepared, or assisted in the preparation of this document.

KATHLEEN C. HAMPTON
Name of *Pro Se* Party (Print or Type)

Kathleen C. Hampton
Signature of *Pro Se* Party

Executed on: 4-25-16 (Date)

OR

(Name of Attorney)

(Address of Attorney)

(Telephone Number of Attorney)

Prepared, or assisted in the preparation of, this document.

(Name of *Pro Se* Party (Print or Type)

Signature of *Pro Se* Party

Executed on: _____ (Date)